

MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Norman S. Rosenbaum
Jordan A. Wishnew

*Counsel for The ResCap Borrower Claims Trust
and the ResCap Liquidating Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, et al.,

Debtors.

Case No. 12-12020 (MG)

Chapter 11

Jointly Administered

**AMENDED¹ PROPOSED AGENDA FOR MATTERS SCHEDULED TO BE
HEARD ON JUNE 15, 2016 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton U.S. Custom House, Courtroom 523, One Bowling Green, New York, NY
10004-1408

I. SETTLED MATTER(S)

- 1. ResCap Liquidating Trust’s Objection to Proofs of Claim Nos. 4406 and 4408 Filed by Brookfield RPS LLC [Docket No. 9327]**

Related Document(s):

- a.** Notice of Filing of Stipulation Adjourning Hearing on ResCap Liquidating Trust's Objection to Proofs of Claim Nos. 4406 and 4408 Filed by Brookfield RPS LLC and Extending Response Deadline in Connection Therewith [Docket No. 9384]

¹ Amended items appear in **bold**.

- b. Notice of Filing of Second Stipulation Adjourning Hearing on ResCap Liquidating Trust's Objection To Proofs of Claim Nos. 4406 and 4408 Filed by Brookfield RPS LLC and Extending Response Deadline In Connection Therewith [Docket No. 9565]
- c. Notice of Filing of Third Stipulation Adjourning Hearing on ResCap Liquidating Trust's Objection to Proofs of Claim Nos. 4406 and 4408 Filed by Brookfield RPS LLC and Extending Response Deadline In Connection Therewith [Docket No. 9685]
- d. Notice of Filing of Fourth Stipulation Adjourning Hearing on ResCap Liquidating Trust's Objection To Proofs of Claim Nos. 4406 and 4408 Filed by Brookfield RPS LLC and Extending Response Deadline In Connection Therewith [Docket No. 9812]
- e. Notice of Adjournment of Hearing On ResCap Liquidating Trust's Objection to Proofs of Claim Nos. 4406 and 4408 Filed by Brookfield RPS LLC [Docket No. 9835]

Response(s): None.

Status: This matter has been settled. No hearing is required.

II. ADJOURNED MATTER(S)

- 2. ResCap Liquidating Trust's Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) [Docket No. 6988]

Related Document(s):

- a. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to July 30, 2014 at 10:00 a.m. [Docket No. 7081]
- b. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to August 13, 2014 at 10:00 a.m. [Docket No. 7238]
- c. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to August 26, 2014 at 10:00 a.m. [Docket No. 7281]
- d. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to September 30, 2014 at 10:00 a.m. [Docket No. 7334]

- e. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to October 30, 2014 at 10:00 a.m. [Docket No. 7478]
- f. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to December 2, 2014 at 10:00 a.m. [Docket No. 7606]
- g. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to December 18, 2014 at 10:00 a.m. [Docket No. 7719]
- h. Notice of Withdrawal of ResCap Liquidating Trusts Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) Solely With Respect To Certain Claims [Docket No. 7721]
- i. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to January 14, 2015 at 10:00 a.m. [Docket No. 7792]
- j. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to February 11, 2015 at 10:00 a.m. [Docket No. 7903]
- k. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to March 12, 2015 at 10:00 a.m. [Docket No. 7996]
- l. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to March 31, 2015 at 10:00 a.m. [Docket No. 8124]
- m. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to April 30, 2015 at 10:00 a.m. [Docket No. 8233]
- n. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to June 23, 2015 at 10:00 a.m. [Docket No. 8417]
- o. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to September 3, 2015 at 10:00 a.m. [Docket No. 8648]
- p. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to November 18, 2015 at 10:00 a.m. [Docket No. 8986]

- q. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to January 7, 2016 at 10:00 a.m. [Docket No. 9269]
- r. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to March 22, 2016 at 10:00 a.m. (ET) [Docket No. 9399]
- s. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability – Underwriter Indemnification Claims); Adjourned to June 15, 2016 at 10:00 a.m. [Docket No. 9629]
- t. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to September 14, 2016 at 10:00 a.m. [Docket No. 9899]

Response(s): None.

Status: The hearing on this matter has been adjourned to September 14, 2016.

III. **ADJOURNED ADVERSARY PROCEEDING MATTERS**

Hawthorne v. GMAC Mortgage LLC (Adv. Proc. No. 12-02050-MG)

3. Status Conference

Related Document(s):

- a. Adversary Proceeding Complaint [Docket No. 1]
- b. Order Directing the Applicability of Borrower Adversary Proceeding Procedures [Docket No. 9]
- c. Notice of Applicability of the Order Approving Mandatory Supplemental AP Procedures for AP Actions [Docket No. 10]
- d. Notice of Status Conference and Status Report [Docket No. 26]
- e. Notice of Adjournment of Status Conference [Docket No. 28]

Status: The status conference on this matter has been adjourned to July 13, 2016.

Charles C. Heyward, Living Trust v. GMAC Mortgage LLC (Adv. Proc. No. 16-01044-MG)

4. Case Management Conference

Related Document(s):

- a.** Plaintiff's Complaint for an Injunction to Prevent Further Acts Until the Validity of the Note Can be Determined and to Determine Nature, Extent and Validity of Lien and Debt as Void [Docket No. 1]
- b.** Summons with Notice of Pre-Trial Conference [Docket No. 2]
- c.** Notice of Applicability of the Order Approving Mandatory Supplemental AP Procedures for AP Actions [Docket No. 3]
- d.** Notice of Adjournment of Pre-Trial Status Conference to June 15, 2016 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 5]
- e.** The ResCap Liquidating Trust's Motion to Dismiss Plaintiff's Adversary Complaint [Docket No. 7]
- f.** Order Re-Scheduling Case Management Conference [Docket No. 8]

Status: The case management conference on this matter has been adjourned to July 13, 2016.

IV. CONTESTED MATTER(S):

- 5. ResCap Borrower Claims Trust's Objection to Proof of Claim No. 1296 Filed by Mary Perkins White [Docket No. 9796]**

Related Document(s):

- a.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Objection to Proof of Claim No. 1296 Filed by Mary Perkins White to June 15, 2016 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 9885]

Response(s):

- a.** Opposition and Response of Mary Perkins White to the Objection of the ResCap Borrower Claims Trust to Claim Number 1296 [Docket No. 9852]
 - (i)** Declaration of Mary Perkins White in Support of Opposition to the Objection of the ResCap Borrower Claims Trust to Claim Number 1296 [Docket No. 9853]

- (ii) Exhibit H through Exhibit N to Declaration of Mary Perkins White in Support of Opposition to the Objection of the ResCap Borrower Claims Trust to Claim Number 1296 [Docket No. 9854]

Reply:

- a. The ResCap Borrower Claims Trust's Reply in Support of its Objection to Claim Number 1296 Filed by Mary Perkins White [Docket No. 9888]

Status: The hearing on this matter will be going forward.

- 6. ResCap Borrower Claims Trust's Ninety-Second Omnibus Objection to Claims ((I) No Liability Borrower Claims and (II) Allowed in Full Borrower Claim) [Docket No. 9486]

Related Document(s):

- a. Notice of Adjournment of Hearings on ResCap Borrower Claims Trust's Ninety-Second Omnibus Objection to Claims ((I) No Liability Borrower Claims and (II) Allowed in Full Borrower Claim) Solely as it Relates to the Claims Filed by Lynn C. Greene and James Cassidy (Claim No. 3484) and Diem Trang Nguyen (Claim No. 3725) [Docket No. 9658]
- b. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Ninety-Second Omnibus Objection to Claims ((I) No Liability Borrower Claims and (II) Allowed in Full Borrower Claim) Solely as it Relates to the Claim Filed by Diem Trang Nguyen (Claim No. 3725) to June 15, 2016 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 9839]

Response:

- a. Diem Trang Nguyen's Response in Opposition to ResCap Borrower Claims Trust's Ninety-Second Omnibus Objection to Claims ((I) No Liability Borrower Claims and (II) Allowed in Full Borrower Claim) [Docket No. 9905]

Reply:

- a. ResCap Borrower Claims Trust's Reply in Support of its Ninety-Second Omnibus Objection to Claims ((I) No Liability Borrower Claims and (II) Allowed in Full Borrower Claim) as to Claim No. 3725 [Docket No. 9929]

Status: The hearing on this matter, solely as it relates to the claim filed by Diem Trang Nguyen (Claim No. 3725), will be going forward.

7. ResCap Borrower Claims Trust's Ninety-Third Omnibus Objection to Claims ((I) Redesignate and Allow Borrower Claims, (II) Reclassify and Allow Borrower Claims, (III) Redesignate, Reclassify and Allow Borrower Claims and (IV) Allow in Full Borrower Claims) [Docket No. 9779]

Related Document(s):

- a. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Ninety-Third Omnibus Objection to Claims ((I) Redesignate and Allow Borrower Claims, (II) Reclassify and Allow Borrower Claims, (III) Redesignate, Reclassify and Allow Borrower Claims and (IV) Allow in Full Borrower Claims) to June 15, 2016 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 9886]

Response(s):

- a. Response of Beverly A. Blake to [ResCap Borrower Claims Trust's Ninety-Third Omnibus Objection to Claims ((I) Redesignate and Allow Borrower Claims, (II) Reclassify and Allow Borrower Claims, (III) Redesignate, Reclassify and Allow Borrower Claims and (IV) Allow in Full Borrower Claims)] [Docket No. 9849]

Reply:

- a. ResCap Borrower Claims Trust's Omnibus Reply in Support of its Ninety-Third Omnibus Objection to Claims ((I) Redesignate and Allow Borrower Claims, (II) Reclassify and Allow Borrower Claims, (III) Redesignate, Reclassify and Allow Borrower Claims and (IV) Allow in Full Borrower Claims) as to Claim No. 1457 [Docket No. 9887]

Status: The hearing on this matter will be going forward.

V. ADVERSARY PROCEEDING MATTERS

Invest Vegas, LLC v. 21st Mortgage Corporation (Adv. Proc. No. 16-01029-MG)

8. Defendant 21st Mortgage Corporation's Motion for Summary Judgment [Docket No. 60]

Related Document(s):

- a. Statement of Undisputed Material Facts Pursuant to Local Bankruptcy Rule 7056-1 in Support of Defendant 21st Mortgage Corporation's Motion for Summary Judgment [Docket No. 60-5]

Response(s):

- a. **Plaintiff's Opposition to Defendant 21st Mortgage Corporation's Motion for Summary Judgment Pursuant to Local Rule 7056 [Docket No. 66]**
- b. **Response of Invest Vegas, LLC to Defendant 21st Mortgage Corporation's Statement of Undisputed Material Facts Pursuant to Local Bankruptcy Rule 7056-1 [Docket No. 67]**

Reply:

- a. **Defendant 21st Mortgage Corporation's Reply to Plaintiff's Opposition to Defendant 21st Mortgage's Motion for Summary Judgment Pursuant to Local Bankruptcy Rule 7056-1 [Docket No. 68]**

Status: The hearing on this matter will be going forward.

Dated: June 14, 2016
New York, New York

/s/ Norman S. Rosenbaum
Norman S. Rosenbaum
Jordan A. Wishnew
MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900

*Counsel for The ResCap Borrower Claims
Trust and the ResCap Liquidating Trust*